

FREEMAN, NOOTER & GINSBERG  
ATTORNEYS AT LAW

LOUIS M. FREEMAN  
THOMAS H. NOOTER  
LEE A. GINSBERG

NADJIA LIMANI  
OF COUNSEL

CHARLENE RAMOS  
OFFICE MANAGER

75 MAIDEN LANE  
SUITE 503  
NEW YORK, N.Y. 10038

(212) 608-0808  
TELECOPIER (212) 962-9696  
E-MAIL: FNGLAW@AOL.COM

WWW.FNGLAW.COM

February 26, 2020

BY ECF

Honorable Cathy Seibel  
United States District Judge  
United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601

Application granted in part and denied in part. The sentencing for all four trial Defendants is adjourned until Thursday, April 2, at 10:30 a.m. Sentencing submissions are due no later than March 19. The Court, however, will not adjourn the bench ruling on the post-trial motions. That will proceed as scheduled on March 13 at 10:30a.m.

SO ORDERED.

  
CATHY SEIBEL, U.S.D.J.

Re: United States v. Christopher Londonio  
17 CR 89 (CS)

3/2/2020

Dear Judge Seibel:

We write to request that the Court adjourn the defendants' sentences and argument on the post-verdict motions currently scheduled for March 13, 2020, to the first week in April 2020, for the following reasons.

On March 13, 2020, Mr. Meringolo will be on trial and therefore unavailable for Mr. Londonio's sentence. Mr. Goltzer will be unavailable March 16th through 27th. In addition, counsel for Steven Crea, Sr. has not yet received a final pre-sentence report. Accordingly, we request that the sentences for all defendants be moved to the first week of April or any date thereafter that is convenient to the court but before April 13th when I begin a two-week trial before Judge Ramos in the Southern District of New York. We also request that the Court hear argument and issue its bench rulings on the post-verdict motions on the same date as the sentences. Finally, we request that the defendants' sentencing submissions be due two weeks prior to the sentence date.

The Government, by AUSA Hagan Scotten, objects to this request as follows:

The Government opposes any motion to the argument and decision of post-trial motions. In the Government's view, the motions are fully briefed and the Court was clear when setting this date

that it would hold regardless whether certain defense attorneys developed other obligations. The Government does not object to a very brief adjournment of sentencing to the following week, so that Mr. Meringolo can attend, but objects to any longer adjournment and to any adjournment that would require the defendants to be sentenced on different days.

Respectfully Submitted,

/s/ Louis M. Freeman

Louis M. Freeman